Lauri Valjakka (Pro Se)

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

LAURI VALJAKKA,
 	
    Plaintiff,
 	
    v.
 	
NETFLIX, INC.,
 	
    Defendant.
	Case No. 4:22-cv-01490-JST
	
	DECLARATION OF LAURI VALJAKKA IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT
	
	Judge: Hon. Jon S. Tigar
	Date: September 22, 2025
	Time: 2:00 p.m.
	
	Crtrm: 6 – 2nd Floor

I, Lauri Valjakka, declare as follows:

1.   My name is Lauri Valjakka. I am over 18 years of age, and have personal knowledge of the facts set forth in this declaration. I make this declaration to support my motion for a summary judgement.

2.   I am the inventor and current assignee of U.S. Patent No. 8,495,167 and U.S. Patent No. 10,726,102.

3.   I am a 70% owner of a Finnish company named CDN Licensing Finland Oy.

4.   I have control over CDN Licensing Finland Oy.

5.   In November of 2021, I granted a license to CDN Licensing Finland Oy for a significant portion of my rights in the '167 patent. These rights included the right to co-litigation and licensing proceeds including from settlements and final judgments.

6.   In December of 2021, I granted a license to CDN Licensing Finland Oy for a significant portion of my rights in the '102 patent. These rights included the right to co-litigation and licensing proceeds including from settlements and final judgments.

7.   CDN Licensing Finland Oy paid me both for the license to the '167 patent and for the license to the '102 patent.

8.   The amount I received in payment for each license was equivalent to the value of each license.

9.   The license to the '167 patent was granted prior to my receipt of any litigation proceeds from lawsuits asserting infringement of the '167 or '102 patents.

10.   My purpose for granting the licenses was to more easily divide my financial interest in the '167 and '102 patents with other investors, to obtain financing for this litigation and others, and to more easily administer the financing and proceeds from this litigation and others.

11.   I had no intent to avoid paying any creditor or future creditor of mine when granting the licenses to CDN Licensing Finland Oy.

12.   I had no fraudulent intent for granting the licenses to CDN Licensing Finland Oy.

13.   When I granted the licenses, I was unaware of any potential future judgment for attorney's fees against myself. I would add that I am not aware of any motion currently pending that would award attorneys' fees.

14.   I did not discuss with anyone nor receive any advice from anyone related to licensing litigation proceeds from the '167 and '102 patents to CDN Licensing Finland Oy for the purpose of putting money out of the reach of future creditors of mine.

15.   I disclosed to my attorneys the existence of CDN Licensing Finland Oy prior to July 11, 2022.

16.   Exhibit A to my motion for summary judgment is a true and correct copy of the ledger of CDN's bank account for 2022. The highlighted entries are the last transfer I made to CDN from AiPi or any other person or entity for Litigation Proceeds or otherwise, in July of 2022.

17.   Exhibit B to my motion for summary judgment is a true and correct copy of the ledger of CDN's bank account for 2023. I made no transfers to CDN from AiPi or any other

person or entity for Litigation Proceeds or otherwise.

18.   Exhibit C to my motion for summary judgment is a true and correct copy of the ledger of CDN's bank account for 2024. I made no transfers to CDN from AiPi or any other person or entity for Litigation Proceeds or otherwise.

19.   Exhibit D to my motion for summary judgment is a true and correct copy of the ledger of CDN's bank account for 2025. I made no transfers to CDN from AiPi or any other person or entity for Litigation Proceeds or otherwise.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct.

Executed on this day on the 25th day of August, 2025 in Finland.

/s/ Lauri Valjakka

Lauri Valjakka